

SANTA MONICA MOUNTAINS CONSERVANCY

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September 22, 2008

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City of Simi Valley
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**Mitigated Negative Declaration Comments for PD-S-0997/TP-S-0650
Alamos Creek Adjacent Industrial Park**

Dear Ms. Sabatini:

Via the environmental review of several recent development proposals, the Conservancy staff has been working with the City staff and project applicants to maximize the function of the Alamos Canyon inter-mountain range habitat linkage. Every project and ownership should make a substantial contribution to mitigate both direct and cumulative impacts on the ever shrinking portion of this linkage between the Union Pacific railroad tracks and the Arroyo Simi. The corridor currently functions as a quality wildlife movement pathway. The biology report for proposed CUP-S-686 at the mouth of Alamos Canyon confirms this current wildlife usage.

The proposed 13-acre project is an intense land use next to a regionally significant wildlife corridor. The grading plan lowers the terrain next to the wildlife corridor which would bring the industrial park even closer to both a corridor choke point and a riparian corridor. The project would also directly impact the creek and result in the significant release of urban runoff into the creek. The Conservancy has granted funds to the Mountains Recreation and Conservation Authority (MRCA) to acquire the adjacent parcel that contains Alamos Creek. The MRCA is negotiating with the owner to acquire the property.

The proposed project unnecessarily and grossly spills over the watershed boundary into the Alamos Canyon watershed and would essentially take the project impacts right to the eastern property line which happens to be the edge of the low flow channel of Alamos Creek. The proposed project makes no compensation for the wildlife corridor and provides only a short manufactured slope and couple of parking lots as a buffer zone. The MND analysis is deficient for not addressing how the close proximity of the project elements to the wildlife corridor will not adversely affect wildlife movement. The core section of the

corridor for wildlife movement is the actual stream channel bottom directly next to the proposed industrial park.

The MND concludes that mitigation measures 9 and 10 will mitigation wildlife corridor impacts. Those two measures address oak tree impacts and their wording has nothing to do with wildlife corridor buffering or protection. The MND is deficient both in its analysis of project impacts on the corridor and putting forth mitigation measures that directly and unequivocally benefit the wildlife corridor. For example there is no MND analysis about lighting or allowed uses directly next to the corridor. The MND also provides no specifics – just generalities of how drainage from the site could adversely impact the habitat quality in Alamos Creek - a key element of the wildlife corridor.

We urge the City to encourage the applicant to move the entire disturbance footprint (limits of grading) at least 100 feet westward to provide adequate buffer and to retain a tiny piece of habitat on the 13-acre site. The project would also result in the loss of many mature oak trees that currently provide substantial habitat. The mitigation oak trees should be planted and maintained in the minimum 120-foot wide ungraded buffer zone next to Alamos Creek. For all intents and purposes the project would mass grade every square foot of the site except for about a hundred-square-feet on a cliff along Alamos Creek. We do not believe that the applicant's project objective must be defined by such wall-to-wall earth movement.

The proposed project makes zero positive contribution and significant negative contribution to the Alamos Canyon regional wildlife corridor between the Santa Susana Mountains and the Simi Hills. We assert that both the direct and cumulative biological impacts on the corridor are unavoidably significant adverse impacts. The only way to reduce those impacts to a level less than significant is to move the project back approximately 100 feet from the corridor. If the project is not substantially changed in this manner, we encourage the City to deny the project or require an Environmental Impact Report so that a less damaging alternative project can be reviewed by the decision makers.

If The Nature Conservancy's acquisition of lower Alamos Canyon goes forward, as all expect it to, as configured the Alamos Canyon wildlife corridor will be a major ecological asset within the City's borders. However, if either the proposed project or CUP-S-686 go through anywhere near as proposed, that great ecological asset will for ever be deteriorated based a 100-foot-wide band of commercial development. We urge the City to demand an independent economic analysis from the project applicant that shows this 100-foot-wide

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band of commercial development next to Alamos Creek is essential to provide a fair and reasonable economic return on his property. If that is the case, then we urge the City of reduce the amount of infrastructure requirements to clearly allow the applicant to pull the project back 100 feet. The key land use element in this equation is the one-of-kind regional wildlife corridor. We urge the City to make this great habitat linkage its legacy, not a chain of industrial parks with a narrow creek sandwiched in between.

Please direct any questions or future CEQA documents to Paul Edelman, Deputy Director for Natural Resources and Planning at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson

cc: State Clearinghouse